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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
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13 INTEL CORPORATION and APPLE INC.,

14 Plaintiffs,

15 v.

16 FORTRESS INVESTMENT GROUP LLC,
17 FORTRESS CREDIT CO. LLC, UNILOC
18 2017 LLC, UNILOC USA, INC., UNILOC
19 LUXEMBOURG S.A.R.L., VLSI
TECHNOLOGY LLC, INVT SPE LLC,
INVENTERGY GLOBAL, INC., and IXI IP,
LLC,

20 Defendants.
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Case No. 3:19-cv-07651-EMC

**STIPULATION AND ~~PROPOSED~~
ORDER SETTING PAGE LIMITS FOR
MOTION TO DISMISS AND STRIKE
BRIEFING**

Pursuant to Civil Local Rule 7-12, plaintiffs Intel Corporation and Apple Inc. (collectively, “Plaintiffs”) and defendants Fortress Investment Group LLC, Fortress Credit Co. LLC, Uniloc 2017 LLC, Uniloc USA, Inc., Uniloc Luxembourg S.a.r.l., VLSI Technology LLC, Inventergy Global, Inc., INVT SPE LLC, and IXI IP, LLC (collectively, “Defendants”) by and through their undersigned counsel hereby stipulate as follows:

WHEREAS, on March 8, 2021, Plaintiffs filed a 160-page Second Amended Complaint (“SAC”) asserting claims for violation of Section 1 of the Sherman Act, Section 7 of the Clayton Act, and Section 17200 of the California Business and Professions Code (Dkt. 236);

WHEREAS, Defendants intend to file motions to dismiss and strike Plaintiffs’ SAC in accordance with the Court’s order approving an extended briefing schedule (Dkt. 240), and seek to coordinate their motion practice in order to reduce redundancy and total pages submitted to the Court;

WHEREAS, the parties have agreed, subject to Court approval, that: (i) all Defendants collectively will be entitled to 45 total pages for their motions to dismiss and strike moving briefs, (ii) both Plaintiffs collectively will be entitled to 45 total pages for their oppositions, and (iii) all Defendants collectively will be entitled to 27 total pages for their replies. Should Defendants respond by way of multiple motions, the parties have further agreed that they may allocate the pages for their respective motions, oppositions, and replies however they choose;

WHEREAS, absent this stipulation, each Defendant would be entitled to file a motion to dismiss and strike of up to 25 pages, and Plaintiffs would be entitled 25 pages to oppose each such motion (L.R. 7-2, 7-3), which would result in potentially hundreds of pages of briefing on the motions to dismiss and strike;

WHEREAS, the requested page limits herein will allow the parties to coordinate their collective briefing and more efficiently present the motion to dismiss and strike issues to the Court;

IT IS HEREBY STIPULATED AND AGREED by and between the parties, subject to the Court’s approval:

1. Defendants may have 45 pages collectively for their motions to dismiss and strike

1 Plaintiffs' SAC to be allocated amongst Defendants however they choose;

2 2. Plaintiffs may have 45 pages collectively for their oppositions to Defendants'
3 motions to be allocated among Plaintiffs however they choose;

4 3. Defendants may have 27 pages collectively for their replies to be allocated among
5 Defendants however they choose.

6 IT IS SO STIPULATED.

7 Dated: April 16, 2021

Respectfully submitted,

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27
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ORDER

Pursuant to stipulation, IT IS SO ORDERED.

DATED: April 16, 2021



The Honorable Edward M. Chen
United States District Judge